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April 1, 2021

Elisa W. v. The City of New York, et al.,
No. 15-CV-5273 (KMW) (SLC)

MEMO ENDORSED

Dear Judge Wood:

**Granted
- KMW**

Pursuant to Rule 5.B. of Your Honor's Individual Rules of Practice, we write on behalf of Named Plaintiff Children requesting approval of certain redacted filings in connection with Named Plaintiff Children's Reply Brief in support of their Renewed Motion for Class Certification.

In order to protect the identity and personal information of the Named Plaintiff Children, and consistent with the governing Protective Order in this case, ECF No. 391, we redacted from Exhibit 9 personally identifying information of one of the Named Plaintiff Children. Exhibit 9 is an excerpt from Named Plaintiff Child Elisa W.'s Family Services Progress Notes, which were produced by City Defendant. Under the operative Protective Order, information about any person previously in the care and custody of the Commissioner of ACS for purposes of foster care reflected in "case-specific files" maintained by ACS should be treated as "Confidential Information" and "be filed in a sealed envelope, or filed electronically under seal, if permitted by court rule". See ECF No. 391, at ¶¶ 1, 2, 19.

Named Plaintiff Children have conferred with City and State Defendants, City Defendant consented to this request and State Defendant deferred to City Defendant. Named Plaintiff Children are available at the Court's convenience should Your Honor have any questions or wish to discuss this request.

SO ORDERED.
Dated: April 3, 2021
New York, NY

/s/ Kimba M. Wood

**The Honorable Kimba M. Wood
United States District Judge**

Sincerely,



Julie A. North

The Honorable Kimba M. Wood
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
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BY ECF
Encl.

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